

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

Bianey GARCIA PEREZ, Maria  
MARTINEZ CASTRO, J.M.Z.,  
Alexander MARTINEZ HERNANDEZ,  
on behalf of themselves as individuals  
and on behalf of others similarly  
situated,

Plaintiffs,

v.

U.S. CITIZENSHIP AND  
IMMIGRATION SERVICES; Ur  
JADDOU, Director, U.S. Citizenship  
and Immigration Services; EXECUTIVE  
OFFICE FOR IMMIGRATION  
REVIEW; David NEAL, Director,  
Executive Office for Immigration  
Review,

Defendants.

Case No. 2:22-cv-00806-JHC

JOINT STATUS REPORT &  
STIPULATION & ORDER

**PARTIES' JOINT STATUS REPORT AND STIPULATION**

Plaintiffs Bianey Garcia Perez; Maria Martinez Castro; J.M.Z.; Alexander Martinez Hernandez; and Defendants U.S. Citizenship and Immigration Services (“USCIS”); Ur Jaddou, Director, USCIS; Executive Office for Immigration Review (“EOIR”); and David L. Neal, Director, EOIR, submit this status report.

The parties’ counsel have agreed to the terms of a settlement agreement. The Department of Justice must complete its settlement review process and approve the settlement. *See* 28 C.F.R. § 0.160(a) (authorizing Assistant Attorneys General to approve settlements with respect to matters assigned to their respective divisions); *id.* § 0.160(d) (requiring that any proposed settlement, regardless of amount or circumstances, be referred to the Deputy Attorney General or the Associate Attorney General, if it meets any one of specified criteria); Civil Division Directive No. 1-15 – 28 C.F.R. Part 0 (available at <https://www.justice.gov/jm/civil-resource-manual-46-redelegation-authority-compromise-civil-claims>). The process has been delayed. Undersigned counsel for Defendants, however, estimates that the Department of Justice’s process will be completed by June 27, 2024.

Plaintiffs and Defendants have previously jointly stipulated to several stays. *See* ECF Nos. 34, 37, 39, 41, 44, 46, 48, 51, 53, 56, 58, 60, 62, 63. Most recently, the parties jointly stipulated to a stay on April 20, 2024. ECF No. 63. On May 2, 2024, this Court granted the parties’ stay and ordered the parties to submit a joint status report on May 28, 2024. ECF No. 64.

In light of these developments, the parties have agreed to stipulate to a thirty-day stay of Defendants’ briefing deadlines. Good cause continues to exist for an extension of time, because the complexity of the issues in this case and the proximity of settlement. If this Court grants an extension, the parties would move for preliminary approval of a settlement agreement or seek a further extension, if necessary, by June 27, 2024.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

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Matt Adams

/s/ Aaron Korthuis

Aaron Korthuis

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Dated this 28th day of May, 2024.

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 28<sup>th</sup> day of May, 2024.

A handwritten signature in black ink, reading "John H. Chun". The signature is fluid and cursive, with the first name "John" being larger and more prominent than the last name "Chun".

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John H. Chun  
UNITED STATES DISTRICT JUDGE